

REMARKS

By this amendment, claims 1, 2, 4-8, 10, 11, and 12 have been amended. These amendments are made to even more clearly recite the claimed invention, do not add prohibited new matter and are fully supported by the specification. Reconsideration and withdrawal of the rejections set forth in the outstanding Office Action are respectfully requested in view of the foregoing amendments and the following remarks.

Objections to the Drawings

The Office Action objects to Figures 7 and 8, asserting that these figures should include a legend, such as, for example, “Prior Art”. Without agreeing with or acquiescing to the objection, Applicants note that the Figures have been amended. Accordingly, Applicants respectfully request withdrawal of the objection.

Claim Interpretations

The Office Action objects to claims 1-12, asserting that the term “unique” is relative terminology. The Examiner asserts that the term “unique” has been interpreted to correspond to the term “specific.” In an effort to clarify the terms, Applicants have amended the claims to recite the term “specific” (rather than the term “unique”). Accordingly, Applicants respectfully request withdrawal of the objection.

Claim Rejections under 35 U.S.C. § 112, second paragraph

The Office Action rejects claims 1, 3-5, 7, and 8 under 35 U.S.C. § 112, second

paragraph, as being indefinite. Specifically, the Examiner asserts that the claim term “type” is a relative term. Applicants submit that this term is not a relative term. The term “device type” and “device type information” in the claims is not used adjectively to mean ‘related to a device or devices.’ The term “device type” refers to the *kind* or *category* of device. Thus, “device type information” refers to information on the type or category of device (*e.g.*, Figure 2 shows device types A, B, ..., and N). Accordingly, Applicants submit that “type” is not a relative term, and requests withdrawal of rejection.

Rejection under 35 U.S.C. § 102(e)

The Office Action rejects claims 1, 2, 5 and 6 under 35 U.S.C. § 102(e) as being anticipated by PIEPHO et al. (U.S. Patent 6,704,401, hereinafter “PIEPHO”).

Initially, Applicants note that the claims recite (using claim 1 as a non-limiting example):

A remote control system which includes a controlled device capable of being controlled through a network and a remote control device which transmits control information based on a user instruction provided on a terminal to the controlled device through the network, wherein

- a) the controlled device includes:
 - a first communication controller that communicates with the network; and
 - a device type storage section that stores device type information representing a type of the controlled device,
- b) the remote control device includes:
 - a second communication controller which communicates with the terminal and remote control device over the network;
 - a device type decision section that receives the device type information from the device type storage section of the controlled device which is designated by an instruction received from the terminal through the first and second communication controllers;
 - a device specific data storage section that stores device specific data which represents information of an operation specific to the controlled device;
 - a device data analyzer that generates data necessary for generating a WEB

display on the basis of the device specific data stored in the device specific data storage section and the device type information received by the device decision section;

a WEB display data generator that generates WEB display data on the basis of the data generated by the device data analyzer,

wherein the device data analyzer extracts data specific to the controlled device on the basis of the received device type information, from the device specific data stored in the device specific data storage section; and

the WEB display data generator generates the WEB display data on the basis of the specific data extracted by the device data analyzer, and transmits the WEB display data to the terminal through the second communication controller.

Thus, the claimed invention comprises a remote control device, a controlled device, and a terminal, wherein the remote control device remotely controls the controlled device from a terminal. In contrast, PIEPHO is directed to a Digital Entertainment Center (DEC), which is essentially a personal computer with the ability to play music and movies that are either loaded on the computer or downloaded via the Internet. The DEC may be remotely accessed via a telephone connection or network to control operations of the DEC. Configuration server 114 transmits configuration information specific to appliance 101, to appliance 101, based on the serial number of appliance 101. Then, appliance 101 configures software (WEB browser setting, modem parameter, etc.) based on the configuration information to access an Internet Service Provider (ISP 112) or Internet 113. In other words, PIEPHO only exchanges configuration information between configuration server 114 and appliance 101.

Thus, the system in PIEPHO facilitates the connection of an appliance in a network or access to configuration information for such an appliance, but does not disclose nor teach *control* of a controlled device from a terminal via a remote control device, as recited in the claimed invention. For this reason alone, Applicants submit that PIEPHO fails to disclose all of the

elements of the claimed invention.

Furthermore, as PIEPHO is directed to a configuration server which solely communicates with a DEC, PIEPHO does not teach or suggest a system, which is configured to store device type and device type information and analyze device data according to the specific type of controlled device. Specifically, there is nothing in PIEPHO that discloses “a device type storage section that stores device type information representing a type of the controlled device,” “a device type decision section that receives the device type information from the device type storage section of the controlled device which is designated by instruction received from the terminal through the first and second communication controllers,” or “a device data analyzer that generates data necessary for generating a WEB screen on the basis of the device specific data stored in the device specific data storage section and the device type information received by the device decision section” (as recited in the claims). As PIEPHO fails to store specific device types, analyze device data based upon device type, or even recognize a device type, PIEPHO cannot generate WEB data “on the basis of the specific data extracted by [a] device data analyzer,” and transmit this WEB data to the terminal (as required by the claims). For at least these reasons, Applicants submit that PIEPHO fails to disclose all of the elements of the claimed invention, and request withdrawal of the rejections.

Rejection under 35 U.S.C. § 102(e)

The Office Action rejects claims 3, 4 and 7-12 under 35 U.S.C. §103(a) as being obvious over the combination of PIEPHO and Perry et al. (U.S. Patent 6,195,501, hereinafter “PERRY”).

For the reasons discussed above, PIEPHO fails to disclose all of the elements of the

claimed invention. As the Examiner relies upon PERRY to merely disclose a video recording device as a controlled device, PERRY does not cure the aforementioned deficiencies found in PIEPHO.

Furthermore, PERRY discloses a system that allows a computer to remotely control the operation of a video cassette recorder (VCR) using a radio frequency transmitter connected to the computer. Accordingly, the system in PERRY is merely a computer and a VCR as a controlled device. In contrast, the claimed invention recites a remote control device, a controlled device, and a terminal. PERRY does not teach a remote control device, which is separate from a terminal because the computer acts as a remote control device and terminal in PERRY. Accordingly, Applicants submit that the Examiner has improperly combined PERRY and PIEPHO because the configuration taught in PERRY is incompatible with the configuration disclosed in PIEPHO, as well as the configuration of the claimed invention.

For at least these reasons, Applicants submit that independent claims 3, 4 and 7-12 are not rendered obvious by any proper combination of PIEPHO and PERRY, and respectfully request withdrawal of the rejections. Furthermore, Applicants further submit that dependent claims 3, 4 and 7-12 are allowable for at least the same reasons applicable to independent claims 1, 2, 5, and 6, and additionally, for the specific features recited in each dependent claim.

CONCLUSION

In view of the foregoing amendments and remarks, Applicants submit that all of the claims are patentably distinct from the prior art of record and are in condition for allowance. The Examiner is respectfully requested to pass the above application to issue.

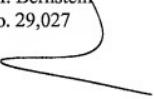
Please charge any deficiencies in fees and credit any overpayment of fees to Deposit Account No. 19-0089. Should the Examiner have any questions or comments, the Examiner is invited to contact the undersigned at the below-listed telephone number.

Respectfully submitted,
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